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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

MICHAEL DAVID SILLS and)
MARY SILLS,)
)
Plaintiffs,)
) Case No. 3:23-cv-00478
VS.) Judge William L. Campbell, Jr.
) Magistrate Judge
SOUTHERN BAPTIST) Jeffery S. Frensley
CONVENTION, a non-profit)
corporation, et al,)
)
Defendants.)
X

VIDEOTAPED DEPOSITION OF MARY SILLS
TAKEN ON OCTOBER 3, 2024

Prepared by:
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1 THE WITNESS: Bart Barber. I don't remember
2 the rest of the people.

3 BY MS. CALLAS:

4 Q. That's fine. So you remember three. You
5 mentioned Jennifer Lyell. I think you mentioned the
6 Southern Baptist Convention; is that right?

7 A. Yes.

8 Q. And Bart Barber?

9 A. Yes.

10 Q. Tell me what the Southern Baptist Convention
11 has done, that is, what conduct they've engaged in, that
12 has --

13 A. They are ultimately responsible for the
14 actions of Bart Barber, who represents them and also
15 represents Baptist Press, who was greatly involved in
16 this, and Guidestone [sic], as well.

17 Q. So the Southern Baptist Convention is
18 ultimately responsible for those entities and people
19 you've identified. Tell me what Bart Barber has done
20 specifically to harm you, Mary Sills.

21 A. He retweeted a tweet from Eric Geiger that
22 said I was complicit in this inappropriate relationship
23 with Jennifer Lyell. And I have never met the man,
24 never spoken to the man, don't know the man. And he
25 said that about me. He doesn't know me.

1 Q. And this is Bart Barber you're speaking of?

2 A. Yes.

3 Q. Do you know Eric Geiger?

4 A. Only from her talking about him.

5 Q. And this would be Jennifer talking about Eric
6 Geiger?

7 A. Yes.

8 Q. And this -- when would she have talked about
9 him, if you remember?

10 A. She would -- we would have conversations all
11 the time, and she would talk to me about her work. And
12 he was her boss.

13 Q. Did you ever have an interaction with him?

14 A. No.

15 Q. Did you form any impression of him based on
16 Jennifer's comments about him?

17 A. Not really.

18 Q. I mean, were her comments positive, or
19 negative, or you don't have a recollection?

20 A. Both, I'm sure.

21 Q. Did you form any opinion or impression of her
22 view of him, meaning whether she viewed him positively
23 or negatively?

24 A. No.

25 Q. So you've mentioned Bart Barber retweeting a

1 tweet of Eric Geiger; is that correct?

2 A. Yes.

3 Q. What about the Baptist Press, what statement
4 has the Baptist Press made about Mary Sills?

5 A. I don't know if that's specifically about me,
6 but if it involves my husband, it involves me.

7 Q. And what about -- you said Guidestone, and
8 I'll -- Guidepost.

9 A. Post, sorry.

10 Q. So you've mentioned Guidepost. What
11 statement did Guidepost make about Mary Sills?

12 A. Not about me, specifically. But, again, when
13 you talk about my husband, you talk about me.

14 Q. There are other defendants. Do you
15 understand there are other defendants you have sued?

16 A. Yes.

17 Q. And you don't recall the specific names; is
18 that right?

19 A. Yes.

20 Q. I will identify them for you, and you can
21 tell me what you understand they have done or how
22 they've acted to harm you, Mary Sills?

23 A. Okay.

24 Q. Ed Litton is one of those people.

25 A. Also a member of the Southern Baptist

1 Convention and the Executive Committee responsible for
2 the actions of their people.

3 Q. And those people are?

4 A. Anyone that is employed by the Southern
5 Baptist Convention.

6 Q. Okay. And so which of those people employed
7 by the Southern Baptist Convention do you allege have
8 harmed you, Mary Sills?

9 A. Bart Barber, specifically.

10 Q. So Ed Litton is, if I understand what you've
11 said -- and I know you are not a lawyer, but you're
12 telling me what your case is about. Ed Litton is
13 responsible for what Bart Barber had to say, in your
14 words?

15 MS. RILEY: Object to the form.

16 THE WITNESS: Ultimately, he is responsible.

17 BY MS. CALLAS:

18 Q. Did he have any separate conduct that you
19 know of that you allege was harmful to you?

20 A. No.

21 Q. What about Rolland Slade?

22 A. Again, he is part of the Executive Committee.
23 The buck stops with him.

24 Q. And Rolland Slade, you would attribute
25 responsibility for Bart Barber's tweet; is that right?

1 A. Yes.

2 Q. Did Rolland Slade engage in any conduct,
3 himself, that you allege was harmful to you?

4 A. No.

5 Q. Willie McLaurin is another defendant?

6 A. The same.

7 Q. Now, you've not mentioned the seminary. Do
8 you know that you have sued the seminary?

9 A. Again, the seminary is part of the Southern
10 Baptist Convention, therefore, they're responsible, too.

11 Q. And is there any particular person or
12 statement that was made that you attribute to the
13 seminary, or are we -- you know, we've talked about Bart
14 Barber, Guidepost, and the Baptist Press?

15 A. When an entity is big, like the Southern
16 Baptist Convention, there are a lot of people that are
17 supposed to report. And the people at the top are
18 responsible for whatever is said by any of their people,
19 ultimately. And Dr. Mohler is a representative of the
20 Southern Baptist Theological Seminary, which is part of
21 the Southern Baptist Convention. And it all trickles
22 down.

23 Q. Is it correct, Mrs. Sills, that the only
24 statement made about you was the retweet by Bart Barber?

25 A. That I know of.

1 Q. You mentioned the Baptist Press. Did your
2 name appear in any Baptist Press article or press
3 release, if you recall?

4 A. I don't recall.

5 Q. Did your name appear in the Guidepost report,
6 if you know?

7 A. I don't know.

8 Q. Did you look for your name in the report?

9 A. I didn't want to read the whole report.

10 MS. CALLAS: Why don't we -- let's take a
11 five- or ten-minute break. We may come back, or have
12 lunch, or do something, but we'll take a little break.

13 THE VIDEOGRAPHER: Off the record at 11:42.
14 (Recess observed.)

15 THE VIDEOGRAPHER: Back on the record at
16 12:27.

17 BY MS. CALLAS:

18 Q. Mrs. Sills, what year did your daughter
19 graduate from college?

20 A. 2009? I don't remember.

21 Q. Do you recall that Jennifer Lyell attended
22 some aspect of the graduation ceremony or celebration?

23 A. I don't remember.

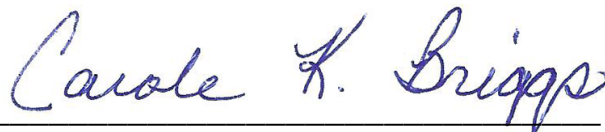
24 Q. Did you ever have a conversation with Molly
25 -- instead of saying ever, let me say around the time of

CERTIFICATE

I, CAROLE K. BRIGGS, Licensed Court Reporter
within and for the State of Tennessee, do hereby certify
that the above deposition was reported by me and that
the foregoing pages of the transcript is a true and
accurate record to the best of my knowledge, skills, and
ability.

I further certify that I am not a relative,
counsel or attorney of either party nor employed by any
of the parties in this case or otherwise interested in
the event of this action.

IN WITNESS WHEREOF, I have hereunto affixed my
official hand on this 18th day of October 2024.

A handwritten signature in blue ink that reads "Carole K. Briggs". The signature is written in a cursive style and is positioned above a horizontal line.

CAROLE K. BRIGGS
Shorthand Reporter
Tennessee License No. 345